

**SETTLEMENT  
AGREEMENT  
EXHIBIT L**

**This Notice Contains Important Information About Your Rights.**

**1. WHY AM I RECEIVING THIS NOTICE?**

A Settlement has been reached in a class action lawsuit in which you have been identified as a potential class member. The case is *Nevarez, et al. v. Forty Niners Football Company, LLC, et al.*, No. 16-CV-07013-LHK (SVK). This notice summarizes the Settlement and your rights and options. For more information, please visit the Settlement Website at [www.LewisStadiumclassactionsettlement.com](http://www.LewisStadiumclassactionsettlement.com) where you can view a more detailed notice and the Settlement Agreement and can file a claim online. You can also contact the Settlement Administrator at [address] or [phone number] or call or email the law firms the Court has appointed as Class Counsel to represent you and all other Settlement Class members: Schneider Wallace Cottrell Konecky Wotkyns LLP - (415) 421-7100; AccessLevis@schneiderwallace.com; Goldstein, Borgen, Dardarian & Ho - AccessLevis@gbdhlegal.com; (866) 723-1494; and Peiffer Wolf Carr & Kane, APLC - AccessLevis@prwlegal.com; (415) 766-3592

**2. WHAT IS THE SETTLEMENT ABOUT?**

The Plaintiffs in this case allege that people with mobility disabilities who use a wheelchair, scooter, or other aids, along with their nondisabled companions, have been denied full and equal access to Levi's Stadium and related facilities, services, amenities, and privileges. The Defendants in this case deny those allegations, and assert that they have provided such people with disabilities and their nondisabled companions full and equal access to the Stadium and related facilities, services, amenities, and privileges. The Settlement resolves the case, without the Court deciding who is right. **The Settlement has two main parts. First**, the Settlement requires the Defendants to make physical changes to Levi's Stadium to ensure the Stadium will be fully accessible to people with mobility disabilities. Such modifications include, among others, the following: additional accessible parking adjacent to the Stadium; an accessible path of travel from the accessible parking to the Stadium entrances and throughout the Stadium; new signage throughout the Stadium directing persons with mobility disabilities to the accessible path of travel, including to elevators and accessible seating areas; eliminating excessive slopes in accessible seating areas; providing integrated accessible seating in all dining areas and bars; and modifying service countertops and box office windows to permit access to services provided at those locations. It also requires that Defendants change their ticketing policies and practices to accommodate people with mobility disabilities. **Second**, the Settlement requires Defendants to create a \$24 million Damages Fund. If you are in the Damages Class, you may file a claim to receive a monetary award from the Damages Fund.

**3. AM I ENTITLED TO A MONETARY AWARD?**

**You are a member of the Damages Class and may file a claim to receive a monetary award if you:** (1) have a mobility disability and use a wheelchair, scooter, or other mobility aid; (2) bought, attempted to buy, or someone else bought on your behalf a ticket for accessible seating at Levi's Stadium between April 13, 2015 and [DATE of preliminary approval order]; and (3) you were denied full and equal access to Levi's Stadium's facilities, services, accessible seating, parking, amenities, privileges, and features when attending the event.

**4. HOW DO I FILE A CLAIM?**

**To receive a monetary award, you MUST fill out and submit a Claim Form no later than [deadline].** To submit a Claim Form, either complete and mail the included Claim Form to the Claims Administrator, postmarked no later than [deadline]; or complete a Claim Form online at [LevisStadiumclassactionsettlement.com](http://LevisStadiumclassactionsettlement.com). Please read the Claim Form carefully and provide all the information required.

**5. WHAT IF I DO NOTHING?**

If you are a member of the Damages Class and do nothing, you will get no money from the Settlement. You will also give up your right to sue or continue to sue the Forty Niners Defendants for statutory damages arising from the denial of full and equal access to Levi's Stadium and related facilities.

**6. CAN I OPT OUT OR OBJECT TO THE SETTLEMENT?**

If you are a Damages Class member, you may exclude yourself from the Damages Class by mailing a letter to [Settlement Administrator Address] by [DATE]. The letter must clearly state that you want to opt out of the Damages Class in *Nevarez, et al. v. Forty Niners Football Company, LLC, et al.* (No. 16-CV-07013-LHK (SVK)). If you opt out of the Damages Class, you will not receive a monetary settlement award from the Damages Fund. However, you will keep any right you have to sue the Forty Niners Defendants separately for statutory damages arising from the violations of the California Unruh Civil Rights Act challenged in this case. You may not opt out of the portion of the Settlement that requires physical changes to Levi's Stadium (injunctive relief). If you do not like any part of the Settlement, the deadline to file a written objection is [deadline]. The detailed notice available on the Settlement Website explains how to opt out or object.

**7. WILL THE COURT HAVE A HEARING ABOUT THE SETTLEMENT?**

The Court will hold a hearing on [date] to decide whether to approve the Settlement, Class Counsel's request for reasonable attorneys' fees and costs up to \$13,457,152.40, and the Class Representatives' request for service awards of up to \$7,500. Defendants' payment of attorney fees and costs, as well as service awards, will not in any way diminish the Damages Fund or the money that any member of

the Damages Class may receive. The hearing may be moved to a different date or time without additional notice, so please check the Settlement Website for updates. **You do not have to come to this hearing in order to get a monetary award.**

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